

WHEREAS the Parties agree, subject to Court approval and in order to avoid the potentially unnecessary expenditure of additional resources by this Court and the Parties, to stay all proceedings in this matter until such time as resolution is concluded and a written agreement is signed by the parties, and that a stay of the proceedings will not prejudice the action.

WHEREFORE in light of the foregoing agreements between Hybrid Audio and ACI, as outlined above, Hybrid Audio respectfully moves this Court to order that this action be stayed until further notice.

Respectfully submitted,

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IT IS SO ORDERED.

Dated: October 13, 2016

Honorable Rya W. Zobel, U.S.D.J.

LOCAL RULE 7.1 CERTIFICATION

The undersigned counsel for Plaintiff certifies that on October 10, 2016, he conferred with counsel for Defendant, Li Chen, of the law firm of Chen Malin LLP in Dallas, Texas, and that the Defendants are in agreement with the substance of the foregoing pleading.

/s/ Timothy Devlin

Timothy Devlin

CERTIFICATE OF SERVICE

I hereby certify that, on October 13, 2016, I electronically filed the foregoing with the Clerk's Office using the Court's CM/ECF system, which will send notification of this filing (NEF) to all registered participants and paper copies will be sent to those indicated as non-registered participants.

/s/ Raymond P. Ausrotas

Raymond P. Ausrotas